

KEVIN V. RYAN (CSBN 118321)
United States Attorney

EUMI L. CHOI (WVBN 0722)
Chief, Criminal Division

TRACIE L. BROWN (CSBN 188349)
ANDREW P. CAPUTO (CSBN 203655)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
FAX: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-0173 VRW
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER RE EXPERT DISCLOSURES
v.)	
)	
APPLE GATE,)	
)	
Defendant.)	

In an effort to prepare this matter for trial, plaintiff United States of America and defendant Apple Gate hereby stipulate as follows:

1. The Defendant will make his expert disclosures as follows:

Expert disclosure/summary (Rule 16(b)(1)(C)):	July 12, 2006
Expert report (Rule 16(b)(1)(B)):	July 24, 2006
2. The government will make its expert disclosures as follows:

Expert disclosure/summary (Rule 16(a)(1)(G)):	July 27, 2006
Expert report (Rule 16(a)(1)(F)):	August 7, 2006
3. If the expert for either party prepares a supplemental report, it shall be disclosed to the opposing side no later than one business day after receipt from the expert. Likewise, if the expert for either party provides any verbal supplemental analysis, counsel shall provide the

opposing counsel a letter setting forth that analysis no later than one business day after learning of the supplemental analysis from the expert.

4. Failure to comply with these agreed-upon deadlines may be grounds for exclusion of the expert's testimony, notwithstanding the passage of the Court's deadline for motions *in limine*.

SO STIPULATED:

DATED:

/S/
ELIZABETH FALK
Assistant Federal Public Defender

DATED:

/S/
TRACIE L. BROWN
Assistant United States Attorney

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. The stipulations set forth in paragraphs 1-4, above, are hereby adopted as the Order of this Court.

DATED: July 18, 2006


VAUGHN R. WALKER
Chief Judge, United States District Court